

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

RING & RING, LLC)	
)	
Plaintiff)	
)	
v.)	Case No. _____
)	
SAMUEL E. TRAPP, ZESTO'S LLC, JOHN DOE, and JOHN DOE.)	Removed from the Circuit Court of Cole County, Missouri case number 12AC-CC00274
)	
)	
Defendants)	

NOTICE OF REMOVAL

COME NOW Defendants Samuel E. Trapp and Zesto's LLC, through counsel, and provide notice of removal of this action from the Circuit Court of Cole County, Missouri to the United States District Court for the Western District of Missouri, Central Division, pursuant to 28 U.S.C. §1332, 1441 and 1446.

1. This action was commenced in the Circuit Court of Cole County Missouri on May 1, 2012, case number 12AC-CC00274. A copy of the case docket sheet and all pleadings filed in the Circuit Court of Cole County Missouri are attached as Exhibit A and incorporated herein by reference.

2. This Court has original subject matter jurisdiction over this action pursuant to 28 U.S.C. §1331 because this filing involves a federal question.

3. Defendants Samuel E. Trapp and Zesto's, LLC, contemporaneously with this Notice of Removal are filing their Answer.

4. A true and correct copy of this Notice of Removal will be filed with the Circuit Court of Cole County, Missouri and will be served upon plaintiff's counsel.

5. The venue of this removal action is proper pursuant to 28 U.S.C. §1441(a) in the United States District Court for the Western District of Missouri, Central Division which embraces Cole County Missouri, the place where the state court action was pending.

Respectfully submitted,

/s/Christopher M. Freiburger
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ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of June, 2012, a true and accurate copy of the foregoing was mailed first class USPS, postage prepaid to the following:

Matthew Alan Clement
231 Madison St.
Jefferson City, MO 65101

/s/Christopher M. Freiburger
Christopher M. Freiburger #62899